

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 14, 1994

SUBJECT: Management Options for Mercury-containing Lamps

FROM: Michael Shapiro, Director
Office of Solid Waste

TO: Waste Management Division Directors
Regions 1 - 10

The Administrator has just signed a proposal on the management of mercury-containing lamps (e.g., fluorescent and high intensity discharge lamps). A prepublication copy of this notice is enclosed for your information and use as well as a copy of the fact sheet.

As you know, fluorescent and high intensity discharge lamps generally are considered hazardous waste because of their mercury content. Therefore, these lamps must be disposed of as hazardous waste (unless they are generated by households or conditionally exempt small quantity generators).

This proposed rule contains two options for the management of spent mercury-containing lamps (light bulbs). The first option is an exclusion for mercury-containing lamps from regulation as hazardous waste if disposed in municipal landfills that are permitted, licensed, or registered by states with EPA approved municipal solid waste landfill permit programs, or managed in State permitted, licensed, or registered reclamation facilities. The second option would add lamps to the Universal Waste Proposal (58 FR 8102, February 11, 1993), which would establish a streamlined, reduced regulatory management structure for certain widely-generated hazardous wastes. States would not be required to adopt either the exclusion or universal waste system if made final as both options would relax regulation over generators of hazardous waste.

We are considering these two options based on data that indicate these lamps may be safely managed outside of the hazardous waste system or within a reduced, regulatory structure within the hazardous waste system. In addition, fluorescent lamps, as well as other mercury-containing lamps, are used in energy conservation programs which encourage the installation of energy-efficient lighting. Energy-efficient lighting consumes less electricity, reducing the generation of pollution from power plants. The options in today's proposal may encourage participation in these energy conservation programs.

If you need more specific, technical information or assistance, please contact Valerie Wilson at (202) 260-4678 or Greg Helms at (202) 260-6721. If you or your staff want additional copies of the notice, please call the RCRA Docket at (202) 260-9327. The general public can obtain copies by calling the RCRA Hotline at (800) 424-9346.

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